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U.S. BANKRUPTCY COURT  
MARY A. SCHOTT, CLERK

Anthony G. Thomas  
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Reno, NV 89523  
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Debtor In Propria Persona

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA - RENO**

IN RE:	) Case No. BK-N-14-50333-BTB
ANTHONY THOMAS and	) Case No. BK-N-14-50331-BTB
WENDI THOMAS	) (Jointly Administered)
AT EMERALD, LLC	) CHAPTER 7
Debtors.	) DECLARATION OF DOROTHY THOMAS
	) RE: LIMITED OPPOSITION TO ABANDON
	) Date: March 6th 2019
	) Time: 10:00 a.m.
	) Judge: Hon. Bruce T. Beesley
	) Courtroom: 2

**I, Dorothy Thomas declare:**

1. I am submitting this Declaration in support of Debtor Anthony Thomas's Limited Opposition to the Trustee's Motion to Abandon the Portola property.

2. I, along with my husband Eli Thomas am the owner of the 397 2<sup>nd</sup> Ave. Portola Property that I now understand the Trustee wishes to abandon, without specifying to whom she intends to abandon the property.

3. I have read the Declaration of my son Anthony Thomas in Support of his Limited Opposition to the Trustee's Motion to Abandon the property as well as the 2 letters that my son sent to Mr. Hartman, and I support both those letters and what they intend to do, that is first correct a misstatement of the facts that the Portola property was transferred in exchange for \$200,000 and agree with the statement of facts as presented by my son in his letter to the Trustee's attorney requesting that he correct the misstatement of facts as represented in his letter.

4. I have also read the second letter attached to my son's Declaration as Exhibit 2 requesting 5 points to allow my son to assist in ensuring that the cloud on title

1 created by the illegal actions of the Trustee and her attorney in illegally attempting to  
 2 take possession, breaking and entering, vandalizing and changing the locks on the  
 3 Portola property illegally as well as illegally obtaining title insurance and listing the  
 4 property for sale. There is also the issue of possible burglary and theft of items from  
 5 the home due to the failure of the Trustee and her Attorney to respond to my request  
 6 for an inventory of items at the time of the illegal property takeover.

7 5. The fact that Attonrey Hartman refuses to agree to the modest 5 points  
 8 raised in my son's 2-5-2019 letter attached to his declaration as Exhibit 2 shows the  
 9 bad faith conduct and intention of both the Trustee and her attorney in this regard, and  
 10 will create a further burden to myself and my husband who are now saddled with the  
 11 responsibility to clearing title and the mess that the Trustee and her attorney have left  
 12 without taking any responsiblity for their actions or assisting us in clearing title as  
 13 requested in the letter sent by my son to Mr. Hartman on 2-5-2019.

14 6. I am specifically requesting that this Court issue an order  
 15 conveying/abandoning the property to me and my husband Eli & Dorothy Thomas,  
 16 issue an order allowing my son and his wife to faciliate the formal recording and  
 17 acknowledgment of the 2008 conveyance by Deed without any need for further Court  
 18 order or approval of the Bankruptcy Court as well as ordering the Trustee and her  
 19 attorney to lift or cancel the Lis Pendens recorded against the Portola property.

20 I declare under penalty of perjury under the laws of the State of California, the  
 21 laws of Nevada and the laws of the United States that the foregoing is true and correct.  
 22 Executed at: Saratoga, CA on February 20<sup>th</sup>, 2019.

23  
 24   
 25 Mrs. Dorothy Thomas - Owner  
 26 of 397 2<sup>nd</sup> Ave. Portola, CA Property  
 27  
 28

**CERTIFICATE OF SERVICE**

I certify that I am an adult, over the age of 18 years, not a party to the action herein who resides in Washoe County, Nevada. I caused to be served the foregoing document via e-mail to the following persons as listed below from my e-mail address of mickjoseph@sbcglobal.net as follows:

LIMITED OPPOSITION TO TURNOVER MOTION  
DECLARATION OF ANTHONY G. THOMAS  
DECLARATION OF CHRIS PERNA  
DECLARATION OF DOROTHY THOMAS

JEFFREY A. COGAN

jeffrey@jeffreycogan.com, beautausinga@gmail.com, beau@jeffreycogan.com

JERI COPPA-KNUDSON VIA E-MAIL AND US MAIL: 3495 Lakeside Dr. Reno, NV 89509

renobktrustee@gmail.com, jcoppaknudson@ecf.episystems.com

KEVIN A. DARBY

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hersh@darbylawpractice.com, sam@darbylawpractice.com

JEFFREY L. HARTMAN VIA E-MAIL AND US MAIL: 510 W. Plumb Lane Suite B - Reno, NV 89509

notices@bankruptcyreno.com, sji@bankruptcyreno.com

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U.S. TRUSTEE - RN - 7,7

USTPRegion17.RE.ECF@usdoj.gov

JOSEPH G. WENT

jgwent@hollandhart.com, vlarsen@hollandhart.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February \_\_, 2019.

/S/ Mick Joseph

MICK JOSEPH